

FILED

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)

2012 MAY 11 P 12:35

CLERK US DISTRICT COURT
ALEXANDRIA, VIRGINIA

JENNIFER J. TAYLOR
11800 Sunset Hills Road, Apt. 911
Reston, Virginia 20190

Plaintiff,

v.

Civil Action No. 12-12 CV 523

GBL/IDD

REPUBLIC SERVICES, INC.
5860 Trinity Parkway, Suite 120
Centreville, Virginia 20120

REPUBLIC SERVICES OF VIRGINIA, LLC
18500 North Allied Way
Phoenix, Arizona 85054

JASON CALLAWAY
42456 Corro Place
Ashburn, Virginia 20148

RONALD KRALL
5135 Pleasant Forest Drive
Centreville, Virginia 20120-1249

DOUGLAS MURPHY
27002 Roan Court
Chantilly, Virginia 20152

CHRISTOPHER RAINS
16009 Tryon Way
Gainesville, Virginia 20155

and

DANIEL E. JAMESON
10136 Somerset Circle
Munster, Indiana 46321

Defendants.

NOTICE OF REMOVAL

To: United States District Court for the Eastern District of Virginia, Alexandria Division

The Clerk of the Circuit Court for Fairfax County, Virginia

Elaine Charlson Bredehoft, Esq.
Carla D. Brown, Esq.
Charlson Bredehoft Cohen Brown & Sakata, P.C.
11260 Roger Bacon Drive, Suite 201
Reston, VA 20190

PLEASE TAKE NOTICE that on the 11th day of May, 2012, Defendants Republic Services, Inc., Republic Services of Virginia, LLC, Jason Callaway, Ronald Krall, Douglas Murphy, Christopher Rains and Daniel E. Jameson (collectively, "Defendants"), by and through undersigned counsel, hereby join in consent to and do remove this civil action from the Circuit Court for Fairfax County, Virginia pursuant to 28 U.S.C. §§ 1331, 1367, 1441, and 1446. The grounds for this removal are as follows:

1. Plaintiff Jennifer Taylor commenced a civil action pending in the Circuit Court for Fairfax County, Virginia entitled *Jennifer J. Taylor v. Republic Services, Inc. et al.*, Case No. CL 2011-15355 (the "State Court Action"). On April 20, 2012, Plaintiff filed an Amended Complaint, asserting seven claims against Defendants stemming from Plaintiff's employment with Defendant Republic Services of Virginia, LLC, including two claims for unlawful discrimination under Title VII of the federal Civil Rights Act of 1964, and five claims under Virginia common law. Plaintiff alleges that she was subjected to gender discrimination, sexual harassment, and a hostile work environment and was retaliated against in violation of Title VII. She also alleges claims for wrongful termination, negligent retention, tortious interference with business expectancy, conspiracy, and intentional infliction of emotional distress.

2. Defendants accepted service of the Summons and Amended Complaint effective May 2, 2012. Pursuant to 28 U.S.C. § 1446(a), copies of all process, pleadings, and orders served upon Defendants in this action are attached hereto as Exhibit 1.

3. This Court has original federal question jurisdiction over this action under 28 U.S.C. § 1331 because Plaintiff brings claims based on a law of the United States (Title VII).

4. This Court has supplemental jurisdiction over this action under 28 U.S.C. § 1367 because Plaintiff's state and federal claims form part of the same case and arise from the same facts.

5. This Notice of Removal is timely filed pursuant to 28 U.S.C. § 1446(b), in that it is filed within thirty (30) days of receipt of Plaintiff's Amended Complaint.

6. Accordingly, this action may be removed to this Court pursuant to 28 U.S.C. § 1441(a) and (c).

7. Notice of the filing of this Notice of Removal will be given to Plaintiff and will be filed with the Clerk of the Circuit Court for Fairfax County, Virginia pursuant to 28 U.S.C. § 1446(d).

Respectfully submitted,



Virginia E. Robinson, Va. Bar No. 71411
Raymond C. Baldwin (to be admitted pro hac vice)

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Dated: May 11, 2012

Attorneys for Defendants

CERTIFICATE OF SERVICE


I hereby certify that this 11th day of May 2012, I caused a copy of the foregoing Notice of Removal to be sent by First Class mail, postage prepaid, to:

Elaine Charlson Bredehoft, Esq.
Carla D. Brown, Esq.
Charlson Bredehoft Cohen Brown & Sakata, P.C.
11260 Roger Bacon Drive, Suite 201
Reston, VA 20190
Attorneys for Plaintiff



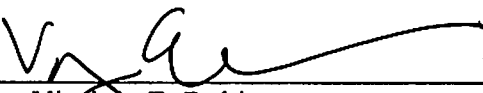
Virginia E. Robinson

I further certify that I promptly will cause a copy of this Notice of Removal to be filed with the Clerk of the Circuit Court for Fairfax County, Virginia in accordance with 28 U.S.C. § 1446(d).



Virginia E. Robinson

I further certify that I have filed herewith as Exhibit 1 all process, pleadings, and orders served upon Defendants in accordance with 28 U.S.C. § 1446(a).



Virginia E. Robinson